

Kevin P. Roddy, Esq.  
WILENTZ, GOLDMAN & SPITZER, P.A.  
90 Woodbridge Center Dr., Suite 900  
Woodbridge, NJ 07095  
Telephone: (732) 636-8000  
Facsimile: (732) 726-6686  
Email: [kroddy@wilentz.com](mailto:kroddy@wilentz.com)

William W. Palmer, Esq. (SBN 146404)  
(*Pro Hac Vice Counsel*)  
PALMER LAW GROUP, a PLC  
2443 Fair Oaks Boulevard, No. 545  
Sacramento, CA 95825  
Telephone: (916) 972-0761  
Facsimile: (916) 972-0877  
[wpalmer@palmercorp.com](mailto:wpalmer@palmercorp.com)

Jonathan S. Massey  
Bret R. Vallacher  
Matthew E. Layden  
(*Pro Hac Vice Counsel*)  
MASSEY & GAIL LLP  
1000 Maine Ave. SW  
Suite 450  
Washington, D.C. 20024  
Telephone: (202) 650-5452  
Facsimile: (312) 379-0467  
[jmassey@masseygail.com](mailto:jmassey@masseygail.com)  
[bvallacher@masseygail.com](mailto:bvallacher@masseygail.com)  
[mlayden@masseygail.com](mailto:mlayden@masseygail.com)

*Attorneys for Plaintiff Vial and proposed Class Members*

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

JAIME VIAL, as representative of the heirs  
of Rene Correa Borquez and on behalf of  
other persons similarly situated,

Plaintiff,

v.

ELIZABETH MAHER MUOIO, in her  
official capacity as TREASURER OF THE  
STATE OF NEW JERSEY; STEVEN  
HARRIS, in his official capacity as  
ADMINISTRATOR OF THE STATE OF  
NEW JERSEY UNCLAIMED  
PROPERTY ADMINISTRATION; and  
KELMAR ASSOCIATES, LLC,

Defendants.

Case No.: 3:24-cv-11301

**NOTICE OF MOTION FOR  
TEMPORARY RESTRAINING  
ORDER AND PRELIMINARY  
INJUNCTION**

**NOTICE OF MOTION FOR TEMPORARY RESTRAINING ORDER AND  
PRELIMINARY INJUNCTION**

Pursuant to Fed. R. Civ. P. 65 and applicable law, Plaintiff Jaime Vial (as legal representative of the heirs of Rene Correa Borquez) hereby moves this Honorable Court, on behalf of himself and all others similarly situated, for a temporary restraining order and a preliminary injunction against Elizabeth Maher Muoio, in her official capacity as Treasurer of the State of New Jersey, Steven Harris, in his official capacity as Administrator of the State of New Jersey Unclaimed Property Administration, and Kelmar Associates, LLC (collectively, “Defendants”), for the reasons stated in the accompanying memorandum and supporting declarations.

Dated: February 3, 2025

Respectfully submitted,

/s/ Kevin P. Roddy

Kevin P. Roddy, Esq.  
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90 Woodbridge Center Dr., Suite 900  
Woodbridge, NJ 07095  
Telephone: (732) 636-8000  
Facsimile: (732) 726-6686  
Email: [kroddy@wilentz.com](mailto:kroddy@wilentz.com)

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Telephone: (916) 972-0761  
Email: [wpalmer@palmercorp.com](mailto:wpalmer@palmercorp.com)

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Suite 450  
Washington, D.C. 20024  
Telephone: (202) 650-5452  
Email: [jmassey@masseygail.com](mailto:jmassey@masseygail.com)  
Email: [bvallacher@masseygail.com](mailto:bvallacher@masseygail.com)  
Email: [mlayden@masseygail.com](mailto:mlayden@masseygail.com)

*Attorneys for Plaintiff Vial and Class Members*

**CERTIFICATE OF SERVICE**

I, Kevin P. Roddy, hereby certify that on this 3<sup>rd</sup> day of February, 2025, I filed the foregoing Notice of Motion for Temporary Restraining Order and Preliminary Injunction with the Clerk of Court using the CM/ECF system, which will effect service on all participating Defendants.

*/s/ Kevin P. Roddy* \_\_\_\_\_

Kevin P. Roddy  
Attorney for Plaintiff and Proposed Class Members